

Nathaniel Adams - Cross (Ms. Jacobsen)

1 Q And he opted to use that number; correct?

2 A That's my understanding.

3 Q Doesn't appear that he used any average in the
4 middle on K1 like he did on K3?

5 A That's -- that's my understanding of his previous
6 description of how he chooses the numbers for reporting. I
7 don't have the decision-making process broken down and the
8 materials provided.

9 Q All right. 'Cause there are none, right, that
10 you're aware of?

11 A I'd be happy to review them. If we do have them,
12 I don't recall seeing them.

13 MR. RILEY: Okay. That's all.

14 THE COURT: Cross?

15 CROSS-EXAMINATION

16 BY MS. JACOBSEN:

17 Q In the materials you received how many pages of
18 numbers like this were the TrueAllele results?

19 A There are two of those tables for each evidentiary
20 item evaluated, so I think there's six total pages. Some of
21 them might have gone on -- for the doorknob and the spindle,
22 they might have gone on to two additional pages as well.

23 Q You hold a bachelor's degree in computer science;
24 correct?

25 A Yes.

Nathaniel Adams - Cross (Ms. Jacobsen)

1 Q You don't have a degree in mathematics; is that
2 true?

3 A Correct.

4 Q And you don't have a degree in statistics?

5 A I don't.

6 Q In fact, you've taken only one college statistics
7 class; is that true?

8 A One named statistics, correct.

9 Q And how many hard science classes have you taken?
10 And by "hard science," I'm meaning biology, chemistry,
11 things like that.

12 A I got AP credit for physics, so I never had to
13 take that in college.

14 Q So AP credit, you took that in high school?

15 A I did.

16 Q College credit in high school?

17 A Yes, ma'am. And I took a year of chemistry, I
18 took a year of anatomy and physiology, I took a semester of
19 microbiology. I assume you mean like laboratory science --

20 Q Yes.

21 A -- courses?

22 I took a year of -- or, excuse me, a semester of
23 biochemistry. There might be others.

24 Q So you don't consider -- while you consider
25 yourself a computer scientist, you don't consider yourself

Nathaniel Adams - Cross (Ms. Jacobsen)

1 another kind of scientist?

2 A I don't know where I fit in this world.

3 Q All right. Fair enough. You've never worked in a
4 DNA lab; is that true?

5 A I have not.

6 Q So you've never done the extraction and the work
7 that you would do in a wet lab, like what Mellissa Helligso
8 was testifying about, doing the actual extraction of the DNA
9 and doing the runs to get the data; is that true?

10 A Correct.

11 Q The only thing you've ever done is reviewed some
12 of that data; correct?

13 A I don't mean to minimize it, but, yes.

14 Q And your training to review that data came from
15 where?

16 A On-the-job experience, attending conferences and
17 workshops.

18 Q Have you done any research?

19 A I have.

20 Q Have you written and published any articles other
21 than the letter to the editor that was just published this
22 year?

23 A I haven't published any peer-reviewed research
24 articles.

25 Q Have you applied for any government grants to do

Nathaniel Adams - Cross (Ms. Jacobsen)

1 research in the area that you've testified about?

2 A I've been -- not personally, no, certainly not as
3 a principal investigator.

4 Q Do you hold any positions at colleges or
5 universities teaching in this area?

6 A I give talks. They're not formal positions.

7 Q And you don't have any post-graduate degrees;
8 correct?

9 A I do not.

10 Q What kind of experience do you have with Bayesian
11 systems like the one TrueAllele is? I'll ask that question
12 first: TrueAllele is a Bayesian system; correct?

13 A It utilizes some Bayesian statistics.

14 Q What kind of experience do you have in Bayesian
15 systems?

16 A Between coursework and reviewing probabilistic
17 genotyping systems, including TrueAllele, that's my
18 experience.

19 Q And your coursework, you've never taken a class
20 specifically related to Bayesian systems; is that correct?

21 A No, I'd say my course on machine learning was
22 almost entirely Bayesian.

23 Q And you've never -- have you ever read a book on
24 Bayesian systems?

25 A Like a 300-page textbook?

Nathaniel Adams - Cross (Ms. Jacobsen)

1 Q Yeah.

2 A I typically don't read whole textbooks.

3 Q So your experience working on actual systems or
4 looking at actual systems is your experience with looking at
5 TrueAllele; true? And perhaps STRmix and some of the
6 others?

7 A No, I don't have experience looking at TrueAllele.
8 I mean, as we've discussed, it hasn't been opened.

9 Q In fact, this idea of looking at the source code,
10 that's not actually something you'd be trained to do as far
11 as looking at the TrueAllele system; is that correct?

12 A I -- as if there were a training program for
13 reviewing?

14 Q No. I mean, if you took advantage of the
15 opportunity to be given to look at this, would you even be
16 the one best suited for reviewing that system?

17 A I have conducted similar reviews for other systems
18 that have been considered productive.

19 Q Have you ever built any software systems?

20 A Yes.

21 Q And you certainly don't consider yourself an
22 expert in Bayesian science; is that fair?

23 A I understand the definition of expert varies
24 widely throughout courts.

25 Q And the software that you've -- you say you have

Nathaniel Adams - Cross (Ms. Jacobsen)

1 built some software systems. Do those comply with the
2 guidelines that you're suggesting TrueAllele needs to comply
3 with?

4 A The ones that don't exist?

5 Q Yeah, the ones that you're talking about ought to
6 be created here.

7 A They don't.

8 Q Okay. Because those guidelines don't exist,
9 that's the critical point. There aren't any guidelines
10 right now; is that true?

11 A I don't develop probabilistic genotyping systems,
12 so the software --

13 Q That's not my question. There aren't guidelines
14 that exist right now, isn't that the bottom line of your
15 testimony? The problem is there aren't guidelines set up
16 that you think ought to be?

17 A I believe there should be standards that aren't.
18 Those are standards for systems that I don't develop.

19 Q I understand that. Would you agree the guidelines
20 that you think are the correct guidelines to follow are not
21 in existence?

22 A Correct.

23 Q You would agree that Perlin, Dr. Mark Perlin, is
24 an expert in Bayesian systems and the genotyping we're
25 talking about?